

**Sep 20, 2022**

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIAMI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
22-20444-CR-ALTMAN/REID**

Case No. \_\_\_\_\_

21 U.S.C. § 963  
21 U.S.C. § 959(c)(2)  
21 U.S.C. § 853  
21 U.S.C. § 970

**UNITED STATES OF AMERICA**

**vs.**

**RIGOBERTO REYES-VELASCO,  
a/k/a "Rigo,"  
a/k/a "Pocillo,"  
VICTOR HUGO CARDONA-LONDOÑO,  
AUGUSTO GOMEZ-ZULUAGA,  
a/k/a "El Ingeniero,"  
a/k/a "el inge,"  
CESAR ALFREDO ARCINIEGAS SANCHEZ,  
a/k/a "Mono,"  
CARLOS ANDRES ZULUAGA LOPEZ,  
a/k/a "Caliche,"  
FABIAN EMILIO PAREDES ARISTIZABAL, and  
MARIA ALEJANDRA VARON-GARCES,**

**Defendants.**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

Beginning in and around November 2019, the exact date being unknown to the Grand Jury, and continuing through on or about September 9, 2021, in the countries of Colombia, Mexico, and elsewhere, the defendants,

**RIGOBERTO REYES-VELASCO,  
a/k/a "Rigo,"  
a/k/a "Pocillo,"  
VICTOR HUGO CARDONA-LONDOÑO,**

**AUGUSTO GOMEZ-ZULUAGA,**  
a/k/a "El Ingeniero,"  
a/k/a "el inge,"  
**CESAR ALFREDO ARCINIEGAS SANCHEZ,**  
a/k/a "Mono,"  
**CARLOS ANDRES ZULUAGA LOPEZ,**  
a/k/a "Caliche,"  
**FABIAN EMILIO PAREDES ARISTIZABAL, and**  
**MARIA ALEJANDRA VARON-GARCES,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to distribute a controlled substance in Schedule II, intending, knowing, and having reasonable cause to believe that such controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Section 959(a); all in violation of Title 21, United States Code, Section 963.

It is further alleged that the controlled substance involved in the conspiracy attributable to the defendants as a result of the defendants' own conduct, and the conduct of other conspirators reasonably foreseeable to the defendants, is five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 959, and Title 21, United States Code, Section 960(b)(1)(B).

**COUNT 2**

Beginning in or around November 2019, the exact date being unknown to the Grand Jury, and continuing through on or about October 4, 2020, in the countries of Colombia, Mexico and elsewhere, the defendants,

**RIGOBERTO REYES-VELASCO,**  
a/k/a "Rigo,"  
a/k/a "Pocillo,"  
**AUGUSTO GOMEZ-ZULUAGA,**  
a/k/a "El Ingeniero,"  
a/k/a "el inge,"

**CESAR ALFREDO ARCINIEGAS SANCHEZ,  
a/k/a "Mono," and  
CARLOS ANDRES ZULUAGA LOPEZ,  
a/k/a "Caliche,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons unknown to the Grand Jury, to possess with intent to distribute a controlled substance, on board an aircraft registered in the United States, in violation of Title 21, United States Code, Section 959(c)(2); all in violation of Title 21, United States Code, Section 963.

It is further alleged that the controlled substance involved in the conspiracy attributable to the defendants as a result of the defendants' own conduct, and the conduct of other conspirators reasonably foreseeable to the defendants, is five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 959, and Title 21, United States Code, Section 960(b)(1)(B).

**COUNT 3**

On or about October 4, 2020, in the countries of Colombia, Mexico, and elsewhere, the defendants,

**RIGOBERTO REYES-VELASCO,  
a/k/a "Rigo,"  
a/k/a "Pocillo,"  
AUGUSTO GOMEZ-ZULUAGA,  
a/k/a "El Ingeniero,"  
a/k/a "el inge,"  
CESAR ALFREDO ARCINIEGAS SANCHEZ,  
a/k/a "Mono," and  
CARLOS ANDRES ZULUAGA LOPEZ,  
a/k/a "Caliche,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, on board an aircraft registered in the United States, in violation of Title 21, United States Code, Sections

959(c)(2), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 960(b)(1)(B), it is further alleged that this violation involved five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine.

### **FORFEITURE ALLEGATIONS**

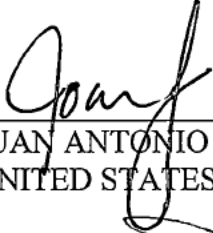
1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, **RIGOBERTO REYES-VELASCO, a/k/a “Rigo,” a/k/a “Pocillo,” VICTOR HUGO CARDONA-LONDOÑO, AUGUSTO GOMEZ-ZULUAGA, a/k/a “El Ingeniero,” a/k/a “el inge,” CESAR ALFREDO ARCINIEGAS SANCHEZ, a/k/a “Mono,” CARLOS ANDRES ZULUAGA LOPEZ, a/k/a “Caliche,” FABIAN EMILIO PAREDES ARISTIZABAL, and MARIA ALEJANDRA VARON-GARCES,** have an interest.

2. Upon conviction of a violation of Title 21, United States Code, Section[s] 963 and/or 959, as alleged in this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, pursuant to Title 21, United States Code, Section 853.

All pursuant to Title 21, United States Code, Sections 853 and 970.

A TRUE BILL

FOREPERSON

*for*  
  
\_\_\_\_\_  
JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
SHARAD A. MOTIANI  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: \_\_\_\_\_

v.

RIGOBERTO REYES-VELASCO, et al.,

**CERTIFICATE OF TRIAL ATTORNEY\***

\_\_\_\_\_/

**Defendants.****Court Division** (select one)

- ☒ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☐ WPB

**Superseding Case Information:**

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of New Counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes  
List language and/or dialect: Spanish
4. This case will take 7 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one)	(Check only one)
I <input type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input checked="" type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) No  
If yes, Magistrate Case No. \_\_\_\_\_
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of \_\_\_\_\_
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By: \_\_\_\_\_

Sharad A. Motiani

Assistant United States Attorney

FL Bar No. 711233

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** RIGOBERTO REYES-VELASCO

**Case No:** \_\_\_\_\_

Count #1:

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported into the United States

Title 21, United States Code, Section 963

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #2:

Conspiracy to possess with intent to distribute cocaine on board an aircraft registered in the United States

Title 21, United States Code, Section 963

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #3:

Possession with intent to distribute cocaine on board an aircraft registered in the United States

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: VICTOR HUGO CARDONA-LONDONO

Case No: \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported

into the United States

\* Max. Term of Imprisonment: Life

\* Mandatory Min. Term of Imprisonment (if applicable): 10 years'

\* Max. Supervised Release: 5 years to life

\* Max. Fine: \$10,000,000.00

Count #:

\* Max. Term of Imprisonment:

\* Mandatory Min. Term of Imprisonment (if applicable):

\* Max. Supervised Release:

\* Max. Fine:

Count #:

\* Max. Term of Imprisonment:

\* Mandatory Min. Term of Imprisonment (if applicable):

\* Max. Supervised Release:

\* Max. Fine:

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** AUGUSTO GOMEZ-ZULUAGA

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported  
\_\_\_\_\_ into the United States

**\* Max. Term of Imprisonment:** Life  
**\* Mandatory Min. Term of Imprisonment (if applicable):** 10 years'  
**\* Max. Supervised Release:** 5 years to life  
**\* Max. Fine:** \$10,000,000.00

Count #: 2

Conspiracy to possess with intent to distribute cocaine on board an aircraft registered in the  
\_\_\_\_\_ United States

**\* Max. Term of Imprisonment:** Life  
**\* Mandatory Min. Term of Imprisonment (if applicable):** 10 years'  
**\* Max. Supervised Release:** 5 years to life  
**\* Max. Fine:** \$10,000,000.00

Count #: 3

Possession with intent to distribute cocaine on board an aircraft registered in the United States.  
\_\_\_\_\_

**\* Max. Term of Imprisonment:** Life  
**\* Mandatory Min. Term of Imprisonment (if applicable):** 10 years'  
**\* Max. Supervised Release:** 5 years to life  
**\* Max. Fine:** \$10,000,000.00

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** CESAR ALFREDO ARCINIEGAS SANCHEZ

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported  
\_\_\_\_\_ into the United States

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #: 2

Conspiracy to possess with intent to distribute cocaine on board an aircraft registered in the  
\_\_\_\_\_ United States

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #: 3

Possession with intent to distribute cocaine on board an aircraft registered in the United States.  
\_\_\_\_\_

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** CARLOS ANDRES ZULUAGA LOPEZ

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported  
\_\_\_\_\_ into the United States

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #: 2

Conspiracy to possess with intent to distribute cocaine on board an aircraft registered in the  
\_\_\_\_\_ United States

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

Count #: 3

Possession with intent to distribute cocaine on board an aircraft registered in the United States.  
\_\_\_\_\_

- \* **Max. Term of Imprisonment:** Life
- \* **Mandatory Min. Term of Imprisonment (if applicable):** 10 years'
- \* **Max. Supervised Release:** 5 years to life
- \* **Max. Fine:** \$10,000,000.00

\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** FABIAN EMILIO PAREDES ARISTIZABAL

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported  
\_\_\_\_\_ into the United States  
\_\_\_\_\_

**\* Max. Term of Imprisonment:** Life  
**\* Mandatory Min. Term of Imprisonment (if applicable):** 10 years'  
**\* Max. Supervised Release:** 5 years to life  
**\* Max. Fine:** \$10,000,000.00  
\_\_\_\_\_

Count #:

\_\_\_\_\_  
**\* Max. Term of Imprisonment:**  
**\* Mandatory Min. Term of Imprisonment (if applicable):**  
**\* Max. Supervised Release:**  
**\* Max. Fine:**  
\_\_\_\_\_

Count #:

\_\_\_\_\_  
**\* Max. Term of Imprisonment:**  
**\* Mandatory Min. Term of Imprisonment (if applicable):**  
**\* Max. Supervised Release:**  
**\* Max. Fine:**  
\_\_\_\_\_

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** MARIA ALEJANDRA VARON-GARCES

**Case No:** \_\_\_\_\_

Count #: 1

Conspiracy to distribute cocaine, knowing and intending that it would be unlawfully imported

into the United States

**\* Max. Term of Imprisonment:** Life

**\* Mandatory Min. Term of Imprisonment (if applicable):** 10 years'

**\* Max. Supervised Release:** 5 years to life

**\* Max. Fine:** \$10,000,000.00

Count #:

**\* Max. Term of Imprisonment:**

**\* Mandatory Min. Term of Imprisonment (if applicable):**

**\* Max. Supervised Release:**

**\* Max. Fine:**

Count #:

**\* Max. Term of Imprisonment:**

**\* Mandatory Min. Term of Imprisonment (if applicable):**

**\* Max. Supervised Release:**

**\* Max. Fine:**

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**